

BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF WASHINGTON

In the Matter of

THE APPLICATION REGARDING
THE CONVERSION AND
ACQUISITION OF CONTROL OF
PREMERA BLUE CROSS AND ITS
AFFILIATES

No. G02-45

OIC STAFF'S OBJECTIONS TO
PREMERA'S PROPOSED
REDACTIONS TO EXPERTS'
REPORTS

INTRODUCTION

On November 13, 2003, Premera Blue Cross and its Affiliates ("Premera") provided proposed redactions of its experts' reports and of the expert report submitted by the Hospital Associations Intervener Group ("Larsen Report") to the OIC Staff. The OIC Staff reviewed each proposed redaction and objects to a number of them. The goal of the OIC staff is to provide the parties and the public with sufficient information to permit meaningful participation in this proceeding, while protecting Premera's truly confidential and proprietary information.

In connection with Premera's proposed redactions, the OIC Staff asserts in support of these objections the same grounds that were presented in its previously-filed objections to Premera's proposed redactions to the consultants' final reports and, rather than repeat them in this instrument, incorporates them herein for all purposes. OIC Staff's Objections to Premera's Proposed Redactions to the Consultants' Reports, pp. 2 – 4. Attached hereto under seal and incorporated herein for all purposes are tables marked 1 through 7 which set out the

1 OIC Staff's objections with copies of the relevant portions of the reports. Only those
2 proposed redactions to which the OIC Staff has objections are listed.

3 **RELIEF REQUESTED**

4 The OIC Staff requests that the Special Master rule on these objections/comments to
5 determine whether the identified text should be redacted or disclosed.
6

7 RESPECTFULLY SUBMITTED this ____ day of November, 2003.

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9 CHRISTINE O. GREGOIRE
10 Attorney General

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12 JOHN F. HAMJE
13 Special Assistant Attorney General
14 WSBA #32400

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16 Attorneys for the Office of the Insurance
17 Commissioner's Staff
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